

**EXHIBIT B**

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March 30, 2011

BY E-MAIL AND FEDEX

Bruce E. Clark, Esq.  
Sullivan & Cromwell LLP  
125 Broad Street  
New York, NY 10004

Re: Rule 2004 Subpoenas to Giants Stadium and Christine Procopos

Dear Bruce,

We write with respect to LBSF's Rule 2004 subpoenas to Giants Stadium LLC ("Giants Stadium"), including your written objection to the subpoena to Christine Procopos for an oral examination (the "March 2011 Subpoena"), and in response to your letter dated March 25, 2011 concerning certain privilege issues.

First, we received written objections from Giants Stadium and Ms. Procopos to the March 2011 Subpoena seeking the deposition of Ms Procopos. We are certainly prepared to discuss these objections with you. We note that Giants Stadium and Ms. Procopos object to the March 2011 Subpoena "insofar as it commands Ms. Procopos to appear and testify regarding issues other than the circumstances of the termination of the transactions entered into between Giants Stadium and Lehman Brothers Special Financing Inc. pursuant to the ISDA Master Agreements" dated July 27, 2007. We do not agree to limit the examination of Ms. Procopos to "the termination of the transactions" at issue. Instead, we will reserve the right to ask questions about matters that relate to or otherwise bear on the relationship between LBSF and Giants Stadium, which may include (but will not be limited to) termination of the transactions. This attempt to limit the topics on which LBSF may examine Ms. Procopos is improper.

Second, we appreciate you having made available for our review certain financial and accounting documents at your offices on March 24, 2011. In that regard, and pursuant to our prior agreement, attached to this letter is a list of those documents which we have reviewed and now request be formally produced to LBSF pursuant to the Rule 2004 Subpoena served on May 19, 2010. In addition, in the course of our review, we noted (a) the absence of any audited financial statements for 2008 and 2009; and (b) any accounting documents or entries valuing the interest rate swap transactions at issue here, either prior to or following their termination. Please either confirm that no such documents exist or produce them to us.

Third, we are in receipt of your March 25, 2011 letter regarding Giants Stadium's privilege logs, in which you note that Giants Stadium will produce some of the documents which it had previously

Bruce Clark, Esq.

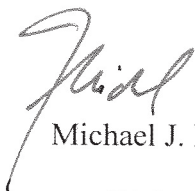
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withheld on privilege grounds. We look forward to your prompt production of these documents. Please confirm the date by which we will receive these documents and an updated privilege log. The letter also suggests that certain documents reflecting communications where Goldman, Sachs & Co. ("Goldman") was a party thereto will not be produced. We continue to believe that all such documents should be produced and nothing in your letter comes close to establishing the very high burden Giants Stadium will have to meet in order to create a privilege for these documents. However, we will await your production and revised privilege log. We believe it will then be appropriate to have another telephone call to see whether we can make further progress in resolving any remaining privilege disputes.

Yours truly,



Michael J. Firestone

cc: Richard W. Slack

DOCUMENTS WHICH LBSF REQUESTS BE PRODUCED BY GIANTS STADIUM

Per discussion with Lara Loyd, the documents listed below are identified by the numbers given to them by Sullivan & Cromwell for the purposes of Lehman's March 24, 2011 review.

Document Numbers:

3-9  
13  
16-19  
21-22  
26  
31  
33-34  
37-47  
50-54  
56-59